



DISTRICT COURT OF MARYLAND FOR Frederick County

Located at 100 West Patrick St, Frederick, Maryland 21701



Case No. D-111-CR-23-000762

STATE OF MARYLAND

VS. HERNANDEZ-LAINEZ, RUBEN ALONSO

COMPLAINANT:

Officer: SKELLY, DET R.
Agency/Subagency: BS 7035
Officer ID: 0456

1208 ALBAN CT APT 1D
FREDERICK, MD 21701

CC#: 23-016520

SID:

FBI#:

LID:

DL#:

Race: W Sex: M Ht:

Wt:

Hair: BRO Eyes: BRO

DOB: 02/26/1996 Home phone:

Cellphone: 240-267-3016

STATEMENT OF CHARGES

UPON THE FACTS CONTAINED IN THE APPLICATION OF Officer: SKELLY, DET R: IT IS FORMALLY CHARGED THAT HERNANDEZ-LAINEZ, RUBEN ALONSO at the dates, times and locations specified below:

NUM	CHG/CIT	STATUTE	PENALTY	DESCRIPTION OF THE CHARGE
001	2 1103	CR 3 304	20 Y	RAPE SECOND DEGREE On or About 02/27/2023 1208 ALBAN CT APT 1D FREDERICK, FREDERICK COUNTY, MD 21701 ...did unlawfully commit a rape in the second degree upon CLAUDIA DE ROBLES CAMPOS, in violation of CR 3-304 of the Annotated Code of Maryland. Against the Peace, Government, and Dignity of the State.
002	1 1415	CR 3 203	10 Y &/or \$2,500.00	ASSAULT-SEC DEGREE On or About 02/27/2023 1208 ALBAN CT APT 1D FREDERICK, FREDERICK COUNTY, MD 21701 did assault CLAUDIA DE ROBLES CAMPOS in the second degree in violation of CR 3-203, contrary to the form of the act of the assembly in such case made and provided and against the peace, government, and dignity of the state. Against the Peace, Government, and Dignity of the State.



DISTRICT COURT OF MARYLAND FOR Frederick County

LOCATED AT (COURT ADDRESS)
100 West Patrick Street

Frederick, MD 21701

D-111-CR-23-000762



COMPLAINANT

DEFENDANT

Detective Rebecca Skelly
 Printed Name
 100 West Patrick Street
 Address
 Frederick, MD 21701 301-600-2101
 City, State, Zip Telephone
 BS 7035 #456
 Agency, Sub-agency, and I.D. # (Officer Only)

Hernandez Lainez, Ruben Alonso
 Printed Name
 1208 Alban Court, Apt 1D
 Address
 Frederick, MD 21701 240-267-3016
 City, State, Zip Telephone
 CC#

DEFENDANT'S DESCRIPTION: Driver's License # _____ Sex M _____ Race W _____ Ht _____ Wt _____
 Hair Br _____ Eyes Br _____ Complexion _____ Other _____ DOB 02/26/1996 ID _____

APPLICATION FOR STATEMENT OF CHARGES

Page 1 of 3

(Include a statement of facts within your personal knowledge (what you saw or heard, what someone said to you, etc.) showing that there is probable cause to believe that a crime has been committed and that the defendant has committed it. Please see the "NOTICE TO APPLICANT FOR A CHARGING DOCUMENT" for further information.)

I, the undersigned, apply for a statement of charges and a summons or warrant which may lead to the arrest of the above named defendant because on or about 02/27/2023 at 1208 Alban Court, Apt 1D

Date

Place

Hernandez Lainez, Ruben Alonso

, the above named defendant

Please see attached.

(Continued on attached 2 pages) (DC-CR-001A)

I solemnly affirm under the penalties of perjury that the contents of this document are true to the best of my knowledge, information, and belief.

05/03/2023

Date

Detective Rebecca Skelly #456
 Officer's Signature
 Detective Rebecca Skelly
 Printed Name

I have read or had read to me and I understand the notice on the back of this form.

Date

Applicant's Signature

Printed Name

Subscribed and sworn to before me May 3rd 2023

Date

Time

□ AM PM

Judge/Commissioner

J.W. Byrd, B082

ID Number

I understand that a charging document will be issued and that I must appear for trial on

Date

at _____, when notified by the clerk, at the court location shown at the top of this form.

Time

Applicant's Signature

 The applicant requests reasonable protection for safety of the alleged victim or the victim's family.

(Describe)

I have advised applicant of the right to request shielding. The applicant declines shielding.
 I declined to issue a charging document because of lack of probable cause.

Date

Commissioner

ID Number



Tr.#231001220881



Printed Name



DISTRICT COURT OF MARYLAND FOR Frederick County

(City/County)

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100 West Patrick Street

Frederick, MD 21701



DC Case : D-111-CR-23-000762

DEFENDANT'S NAME (LAST, FIRST, M.I.)
Hernandez Lainez, Ruben Alonso

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 2 of 3

On 02/28/2023, the Frederick Police Department received a report of a rape that had occurred on 02/27/2023. The victim, 36-year-old Claudia De Robles Campos (D.O.B. 09/05/1986) reported that the suspect, identified as 27-year-old Ruben Alonso Hernandez Lainez (D.O.B. 02/26/1996) raped her in their residence, located at 1208 Alban Ct, Apt 1D, Frederick MD.

Claudia reported that she had needed a place to live, and accepted Ruben's offer to stay with him and 2 other roommates, at 1208 Alban Ct, Apt 1D, in November 2022. Initially, Ruben allowed her to occupy one of the two bedrooms, but eventually, in January 2023, Ruben wanted the bedroom for himself, and told Claudia she could sleep on an air mattress in the living room. Claudia advised Ruben had grown irritated and angry with her, as she had consistently declined his sexual advances since November.

Claudia reported that on the evening of 02/27/2023, she returned to the apartment at approximately 1900 hours. Claudia advised she thought her three roommates, including Ruben, had left the apartment. However, when she walked toward the bathroom, she was startled when she passed Ruben's bedroom. Ruben was standing in his room, wearing only a striped towel. When Ruben saw Claudia, he exited the room, grabbed her by the left wrist, and pulled her into his bedroom.

Claudia advised she heard Ruben say, "You won't be saved" as he pushed her down onto his bed. Claudia said she tried to resist but did not have the strength to push him off her. Claudia reported Ruben held her down with his arm across her chest and yanked the right leg of her leggings off. Claudia told Ruben repeatedly, "No, get off me." Claudia said Ruben forced his penis into her vagina while on top of her on the bed. Claudia advised Ruben grabbed at her breasts with his free hand, under her shirt, while holding her down with his other arm.

Per Claudia, the rape lasted approximately 5 or 10 minutes, as Ruben was rushing to finish before the other roommates returned to the apartment. Ruben did not wear a condom and ejaculated in Claudia's vagina. Claudia advised Ruben did not use a weapon during the rape, only his strength to hold her down. She said she struggled the entire time, reiterating she was not strong enough to push him off. Claudia advised she kept telling Ruben to get off her, but he would not, and told her, "Just let me finish!" Claudia advised she did not scream or call out for help during the rape. Claudia was fearful, as in the past, Ruben had threatened to harm her daughters, who reside in another country, if she angered him.

Shortly after the rape, at approximately 2130 hours, Claudia called the police for assistance. However, when the police arrived, Claudia did not report the rape, as she was distrustful. She worried the police would not believe her and she would be left alone with Ruben and the other male roommates. As such, she only asked the responding officers for help with transportation, as she was scared to remain at the apartment. Shortly thereafter, Claudia went to Frederick Health Hospital for an examination, where she ultimately reported the rape.

Later, on a phone call with Ruben, when Claudia confronted him with the accusation of sexual abuse, Ruben told Claudia it had been her pleasure.

I have reviewed this case with Assistant State's Attorney T. Leache, and respectfully request an Arrest Warrant be issued for Ruben Alonso Hernandez Lainez, with the following charges;

05/03/2023

Date

Detective Rebecca Skelly #456
Applicant's Signature

Detective Rebecca Skelly

Printed Name

Tr.#231001220881



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DEFENDANT'S NAME (LAST, FIRST, M.I.)
Hernandez Lainez, Ruben Alonso

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 3 of 3

2_1103 **RAPE SECOND DEGREE** ...did unlawfully commit a rape in the second degree upon Claudia De Robles Campos in violation of CR 3-304 of the Annotated Code of Maryland.

1_1415 **ASSAULT-SEC DEGREE** ...did assault Claudia De Robles in the second degree in violation of CR 3-203, contrary to the form of the act of the assembly in such case made and provided and against the peace, government, and dignity of the state.

05/03/2023

Date

Applicant's Signature

Detective Rebecca Skelly

Printed Name

Tr.#231001220881

NOTICE OF ADVICE OF RIGHT TO COUNSEL FOR ALL JUDICIAL PROCEEDINGS

TO THE PERSON CHARGED:

1. This paper charges you with committing a crime.
2. If you have been arrested and remain in custody, you have the right to have a judicial officer decide whether you should be released from jail until your trial.
3. If you have been served with a citation or summons directing you to appear before a judicial officer for a preliminary inquiry at a date and time designated or within five days of service if no time is designated, a judicial officer will advise you of your rights, the charges against you, and penalties. The preliminary inquiry will be cancelled if a lawyer has entered an appearance to represent you.
4. You have the right to have a lawyer.
5. A lawyer can be helpful to you by:
 - (A) explaining the charges in this paper;
 - (B) telling you the possible penalties;
 - (C) explaining any potential collateral consequences of a conviction, including immigration consequences;
 - (D) helping you at trial;
 - (E) helping you protect your constitutional rights; and
 - (F) helping you to get a fair penalty if convicted.
6. Even if you plan to plead guilty, a lawyer can be helpful.
7. If you are eligible, the Public Defender or a court-appointed attorney will represent you at any initial appearance before a judicial officer and at any proceeding under Rule 4-216.2 to review an order of a District Court commissioner regarding pretrial release. If you want a lawyer for any further proceeding, including trial, but do not have the money to hire one, the Public Defender may provide a lawyer for you. To apply for Public Defender representation, contact a District Court commissioner.
8. If you want a lawyer but you cannot get one and the Public Defender will not provide one for you, contact the court clerk as soon as possible.
9. **DO NOT WAIT UNTIL THE DATE OF YOUR TRIAL TO GET A LAWYER.** If you do not have a lawyer before the trial date, you may have to go to trial without one.

Contact information for District Court Commissioner's Offices can be found at:

<http://www.mdcourts.gov/district/directories/commissionermap.html>

If you require further information about qualifying for a Public Defender, call 1-833-453-9799.

NOTICE TO DEFENDANT

1. **MUST APPEAR** - If the offense with which you are charged is a 'MUST APPEAR' offense, you may not waive trial but are required to appear in court when notified. Drivers who receive payable citations included with a "Must Appear" citation automatically will receive a trial date notice for all citations. PLEASE NOTE THAT FAILURE TO APPEAR MAY RESULT IN A WARRANT FOR YOUR ARREST.
2. **PRESET FINE** - If ALL of your charges are marked "Payable", you must comply with one of the following within 30 days after receipt of the citation/summons.

OPTION #1 - Pay the full amount of the preset fine for each violation.

OPTION #2 - Request a waiver hearing regarding sentencing and disposition instead of trial - Plead Guilty With an Explanation. Do not send payment.

OPTION #3 - Request a trial date, time, and place established by the District Court of Maryland by writ or trial notice. Do not send payment.

Please note that payment of the preset fine will result in conviction for the offense(s) charged being entered against you and the case being closed. Please note further that points will be assessed by MVA on your driving record after conviction of a violation of the Motor Vehicle Laws of this State. Failure to pay the preset fine or to appear at trial, after notice, will result in the suspension of your driving privileges by the Motor Vehicle Administration.

FOR MORE INFORMATION AND TO PAY CITATIONS:

Visit the MD Judiciary Website at www.mdcourts.gov/district or call the Interactive Voice Response (IVR) System for trial dates, court locations, and directions.

From all areas including out-of-state calls: 1-800-492-2656
TTY users call Maryland RELAY: 711

I have read or have had read to me the contents of the above notice and acknowledge receipt of a copy thereof.

Date Defendant

Date

Judge/Commissioner

IMPORTANT NOTICE

The attached papers charge you with committing a crime. Depending on the crime charged, a jail sentence could be imposed by the court if you are found guilty. You have a right to be represented at trial by a lawyer. ACT IMMEDIATELY to obtain a lawyer. If you cannot afford a lawyer, you may apply for the Public Defender through the **District Court Commissioner** who will determine if you are eligible for the Public Defender to represent you at trial. If you wait too long to retain the Public Defender or private counsel you can be made to stand trial without a lawyer. Applications are accepted at any District Court Commissioner's Office during operating hours. Please contact the office listed below for operating hours:

District Court Commissioner Station for Frederick County
7300 MARCIE'S CHOICE LANE
Frederick, MD 21704
1-833-453-9799

You should bring the following papers to apply for the Public Defender's services:

1. Court charging documents/traffic tickets. (Statement of Charges/all documents issued to you by court).
2. Trial date notices from the court. (You may apply even if no trial date has been received.)
3. If you are employed:
Written proof of salary, pay stubs, or other written verification of income for the last two pay periods.
4. If you are unemployed:
Proof of public assistance, medical assistance, Social Security or
Supplemental Security Income (SSI), or other assistance you are receiving.

For more information on operating hours or locations visit the Maryland Judiciary website:

mdcourts.gov/district/directories/commissionermap

If you require further information about qualifying for the Public Defender, call 1-833-453-9799.

IMPORTANT

IF THE COMMISSIONER DETERMINES THAT YOU ARE ELIGIBLE TO BE REPRESENTED BY THE PUBLIC DEFENDER AT TRIAL, YOU WILL RECEIVE A **FINAL QUALIFICATION** IN WRITING.

ONCE YOU HAVE RECEIVED THE FINAL QUALIFICATION, ALL QUESTIONS SHOULD BE DIRECTED TO THE PUBLIC DEFENDER'S OFFICE:

The address of the Public Defender is: **COURTHOUSE**

100 WEST PATRICK STREET
FREDERICK, MARYLAND 21701

Their telephone number is: **301-600-1988**

The Office of the Public Defender is open weekdays from 8:30 a.m. to 4:30 p.m.

I have read, or have had read to me, the contents of the above notice and acknowledge receipt of a copy thereof.

DATE

SIGNATURE OF DEFENDANT

**IF YOU DO NOT HAVE A LAWYER ON THE TRIAL DATE, YOU MAY
HAVE TO GO TO TRIAL WITHOUT THE ASSISTANCE OF A LAWYER.**